

**SANDERS LAW GROUP**

Craig Sanders, Esq. (Cal Bar 284397)  
Jacqueline Mandel, Esq. (Cal Bar 317119)  
333 Earle Ovington Blvd, Suite 402  
Uniondale, NY 11553  
Tel: (516) 203-7600  
Email: csanders@sanderslaw.group  
Email: jmandel@sanderslaw.group  
File No.: 128105

*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

Viral DRM, LLC,

Plaintiff,

v.

California Off Road Recovery  
Group LLC,

Defendant.

Case No.: 8:24-cv-00871-FMO-AS

**PLAINTIFF'S REQUEST  
FOR ENTRY OF DEFAULT**

Pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, plaintiff Viral DRM, LLC ("*Plaintiff*"), hereby requests that the Clerk of the Court enter default against defendant California Off Road Recovery Group LLC ("*Defendant*"), on the ground that said Defendant has failed to appear or otherwise respond to Plaintiff's Summons & Complaint ("*Complaint*") within the time prescribed by Rule 12(a)(1)(A)(ii) of the Federal Rules of Civil Procedure.

On July 19, 2024, a true and correct copy of the Summons, Civil Cover Sheet and Amended Complaint were served upon the Defendant through its Registered Agent. (*Dkt. No.* 28). Defendant was required to file an answer or responsive pleading in this action on or before August 9, 2024. (*Id.*). To date, however,

1 Defendant has failed to file any responsive pleading or otherwise appear in this  
2 action, and Defendant has not requested any extension of time to respond. Therefore,  
3 Plaintiff hereby respectfully requests that the Clerk enter a Certificate of Default  
4 against Defendant.

5 The above-stated facts are set forth in the accompanying Declaration of  
6 Jacqueline Mandel, filed herewith.

7  
8 Dated: August 13, 2024

9 **SANDERS LAW GROUP**

10 By: /s/ Jacqueline Mandel  
11 Craig Sanders, Esq. (Cal Bar 284397)  
12 Jacqueline Mandel, Esq. (Cal Bar 317119)  
13 333 Earle Ovington Blvd, Suite 402  
14 Uniondale, NY 11553  
15 Tel: (516) 203-7600  
16 Email: csanders@sanderslaw.group  
17 Email: jmandel@sanderslaw.group

18 *Attorneys for Plaintiff*

19  
20 Mailed To:

21 California Off Road Recovery Group LLC  
22 473 S. Carnegie Drive., Suite 200  
23 San Bernardino, California 92408  
24  
25  
26  
27  
28